# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

LIONRA TECHNOLOGIES LIMITED

v.

CASE NO. 2:22-cv-00322-JRG-RSP (Lead Case)

FORTINET, INC.

LIONRA TECHNOLOGIES LIMITED

v.

CASE NO. 2:22-cv-00305-JRG-RSP (Member Case)

CISCO SYSTEMS, INC.

LIONRA TECHNOLOGIES LIMITED

v.

CASE NO. 2:22-cv-00319-JRG-RSP (Member Case)

HEWLETT PACKARD ENTERPRISE COMPANY, et al.

LIONRA TECHNOLOGIES LIMITED

v.

CASE NO. 2:22-cv-00334-JRG-RSP (Member Case)

PALO ALTO NETWORKS, INC.

# UNOPPOSED MOTION FOR LEAVE TO SEAL DEFENDANTS' MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404

Defendants Hewlett Packard Enterprise Company and Aruba Networks, LLC ("Defendants") respectfully submit this Unopposed Motion for Leave to Seal Defendants' Motion to Transfer Pursuant to 28 U.S.C. Section 1404.

Defendants' motion to transfer and attachments contain information that is marked "Highly Confidential" and "Outside Attorneys' Eyes Only." Counsel for Defendants conferred with Plaintiff about this motion to seal, and has confirmed that Plaintiff does not oppose the relief sought

by this motion. Defendants will file a redacted version of their motion to transfer and attachments within seven days pursuant to Local Rule 5(a)(7)(E).

As such, Defendants respectfully request this Court enter an order sealing Defendants' Motion to Transfer Pursuant to 28 U.S.C. Section 1404.

## By: /s/ Jennifer H. Doan

Veronica Smith Moyé Texas State Bar No. 24000092 vmoye@gibsondunn.com Mark N. Reiter Texas State Bar No. 16759900 mreiter@gibsondunn.com Ashbey N. Morgan anmorgan@gibsondunn.com Texas State Bar No. 24106339

#### GIBSON, DUNN & CRUTCHER LLP

2001 Ross Ave Suite 2100 Dallas, TX 75201-6912 Telephone: 214.698.3360 Facsimile: 214.571.2907

#### **HALTOM & DOAN**

Jennifer Haltom Doan jdoan@haltomdoan.com Kyle Randall Akin kakin@haltomdoan.com 6500 Summerhill Road Crown Executive Center Suite 100 Texarkana, TX 75503 Telephone: 903.255.1000

ATTORNEYS FOR DEFENDANTS HEWLETT PACKARD ENTERPRISE COMPANY AND ARUBA NETWORKS, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to CM/ECF participants in this case.

/s/ Jennifer H. Doan

Jennifer H. Doan

# **CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Defendants have complied with the meet and confer requirement in Local Rule CV-7(h). On December 2, 2022, Mark Reiter, counsel for Defendants, spoke with Plaintiff's counsel Brett Cooper concerning the relief requested herein. At that time, Plaintiff's counsel indicated that Plaintiff is unopposed.

/s/ Mark N. Reiter

Mark N. Reiter